

January 9, 2008

RE: Dawn Hannum v. Department of Licensing (DOL)
Allocation Review No. ALLO-07-065

Dear Ms. Hannum:

The Director's review of DOL's allocation determination of your position has been completed. The review was based on written documentation.

Background

As part of the realignment of work in DOL's Information Services Division (ISD), DOL conducted a review of a number of ISD positions, including your position. By letter dated June 28, 2007, DOL determined that your Information Technology Specialist/Applications Specialist 6 (ITSAS6) position should be reallocated downward to the Information Technology Specialist 5 (ITS5) classification effective July 1, 2007.

By letter dated July 20, 2007, you asked DOL to reconsider the decision. On July 26, 2007, you filed a request for a Director's review. You asked that your position remain allocated to the ITS/AS6 classification.

By notice dated September 28, 2007, Karen Wilcox, Director's Review Coordinator, confirmed that the review would be considered through written documentation and set a process for the parties to submit additional documentation. On December 7, 2007, DOL submitted additional documentation. DOL submitted a revision to the documentation on December 14, 2007. Also on December 14, 2007, you submitted additional documentation.

Summary of Ms. Hannum's Perspective

You argue that as shown in the Position Description Form (PDF) for your position, you function as the expert and agency spokesperson for the Requirements Development and Management Process. You assert that because your supervisor and manager signed your PDF, the PDF provides the written designation required for allocation to the ITS/AS6 level.

You assert that you provide leadership for large and small projects and that you function as the lead analyst for internal and external representatives, including representatives from other states and the federal government, on a number of complex projects. You contend you function as a

member of project teams as well as the lead and that you set project timelines, assign internal and external resources to tasks, act as the authority on the requirements to be supported in the systems and provide guidance regarding the solutions developed for the projects. You also contend that you provide leadership to other internal teams.

You argue that you participate in tactical planning and coordination of day-to-day activities and that you participate in the IS quarterly planning process to identify upcoming resource needs. You assert that as part of the planning process, you proposed changes in the team, identified areas of specialty for each analyst and gained support of management for the plan.

You assert that you were involved in the group that development, modified, enhanced and reviewed the policies and procedures governing the Requirements Development and Management Process. In addition, you argue that you developed the standard procedure and template for documenting project function specifications, which you presented to the steward group for review and acceptance.

You assert that because your position supervises other ITS5 positions, it would be inappropriate for your position to be allocated to the ITS5. You argue that it is inequitable for your position to perform as both the highest level expert in the work group, providing support to projects as the lead analyst and performing supervisory functions, when the majority of the staff you supervise are working in the same classification as you. You further argue that the lead/supervisors for other ISD work groups at DOL are allocated to the ITS/AS6 classification.

Summary of DOL's reasoning

DOL argues that prior to the transition of DOL's Information Technology Specialist positions to the consolidated Information Technology classifications, DOL undertook a realignment of its ISD organization. DOL contends that the realignment was a radical change from its long-standing divisional support groups and was geared toward quality delivery of services to customers and the functional groupings needed to better deliver those services. DOL explains that the realignment included a review of 39 ISD positions and resulted in the determination that your position best fit the ITS5 level.

DOL argues that your position is not the highest level authority for the agency and is not designated in writing by management to provide technical and organizational leadership in a specialized area of technology. DOL further argues that supervision alone does not cause your assigned duties to rise to the ITS/AS6 level.

DOL contends that your position is the ISD Project and Planning Office Requirements Analyst expert in regard to the work of others and the articulation of specification and document requirements. DOL Acknowledges that you perform as the highest expert professional level analyst 10% of the time and that you elicit, analyze, validate, document and verify customer requirements and provide guidance to others during all phases of projects 10% of the time.

DOL asserts that your position does not make commitments on behalf of the agency and that you are not authorized to determine when to begin production on statewide applications or agency supported systems. DOL acknowledges that you are trusted by management to independently

deal with high risk, high profile initiatives that have significant impact and that you work with other information technology specialists and business experts to document the process trail and to articulate information for current and future customers, clients, consumers and patrons.

DOL argues that the Project and Planning Office has four staff that are designated in writing by management to act as agency spokespersons in their areas of technical expertise and who are allowed to make commitments on behalf of the agency. DOL explains that those positions are the Project and Planning Office Manager and three Project Managers assigned to level 3 projects as determined by the Information Services Board for the Washington State Department of Information Services.

Director's Determination

As the Director's designee, I carefully reviewed all of the documentation in the file including the duties and responsibilities described in the July 2006 Position Description Form for your position. Based on my review of the documents, the available classifications, and my analysis of your assigned duties and responsibilities, I conclude that your position is best described by the ITS5 classification.

Rationale for Determination

The purpose of a position review is to determine which classification best describes the overall duties and responsibilities of a position. A position review is neither a measurement of the volume of work performed, nor an evaluation of the expertise with which that work is performed. A position review is a comparison of the duties and responsibilities of a particular position to the available classification specifications. This review results in a determination of the class that best describes the overall duties and responsibilities of the position. See Liddle-Stamper v. Washington State University, PAB Case No. 3722-A2 (1994).

Your Position Description Form (PDF) provides a summary of your job. The PDF states, in part:

A primary responsibility of this position is the supervision of the Analyst Group. This involves establishing unit strategies and goals, and relating these to the individual members and management. This position organizes and prioritizes the unit's workload and negotiates staff availability with other managers. This position also leads, guides and coaches all division analyst positions. This position hires, fires, evaluates, and disciplines staff.

The other major focus of this position is discovering and communicating the software needs, desires and ideas of the end-users, while bridging the gap between vague customer notions and clear developer specifications. The analyst is an expert in the use of various elicitation techniques, analysis methodologies, and validation and verification of information. The lead analyst is responsible for management of the entire requirements gathering process which will include the writing or the verification of the written design specifications. Ultimately, the analyst's goal is to appreciate, accommodate and improve the user's work by the delivering products that fit seamlessly into that work. The analyst will provide guidance to project managers, testers, and development staff during all phases of the project to insure the product meets customer expectations.

(Emphasis added).

Your position description indicates that you supervise four fulltime staff persons. You supervise two ITAS5 positions, one ITAS4 position and one ITAS2 position.

The Information Technology Specialist classifications are broadly written and encompass a wide variety of positions that perform professional information technology systems and/or applications functions. It is undisputed that your position fits within the category concept for this classification series.

The definition of the ITS/AS6 classification states:

Serves as the highest level authority for an agency or in a major subdivision of DSHS in an information technology specialty area such as, but not limited to: operating system architecture, network architecture, applications development, applications support and enhancement, desktop/server operating systems, data architecture/administration, security architecture/administration, project management methodology or telephony systems architecture.

Your position is not the highest level authority for DOL in a specialty area. Rather, you are the highest level of authority within the Project and Planning Office for the Analyst Group. Your position does not meet the definition of the ITS/AS6 classification.

The distinguishing characteristics for the ITS/AS6 classification state, in part:

This is the expert professional level where incumbents are designated in writing by IT/IS management to provide technical and organizational leadership in a specialized area of technology. Incumbents possess advanced technical as well as business knowledge and grasp the overall impact of their specialty such that they are trusted by management to independently deal with high risk, high profile initiatives that may impact significant/fundamental public services. Incumbents have mastered the ability to translate technological options into business terms and interact with executive management to create technology solutions to mission critical business problems. Incumbents in this class serve as the agency spokesperson in their area of technical expertise and may make commitments on behalf of their agency. Serve as a technical mentor, coach and trainer to others. Often supervises others.

DOL acknowledges that some of your duties and responsibilities fall within the distinguishing characteristics for the ITS/AS6 classification. However, DOL asserts that these duties encompass only 20% of your overall work. My review of your PDF confirms that you occasionally perform higher level work.

Most positions within the civil service system occasionally perform duties that appear in more than one classification. However, when determining the appropriate classification for a specific position, the duties and responsibilities of that position must be considered in their entirety and the position must be allocated to the classification that provides the best fit overall for the

majority of the position's duties and responsibilities. See Dudley v. Dept. of Labor and Industries, PRB Case No. R-ALLO-07-007 (2007).

In Salsberry v. Washington State Parks and Recreation Commission, PRB Case No. R-ALLO-06-013 (2007), the Personnel Resources Board addressed the concept of best fit. The Board referenced Allegri v. Washington State University, PAB Case No. ALLO-96-0026 (1998), in which the Personnel Appeals Board noted that while the appellant's duties and responsibilities did not encompass the full breadth of the duties and responsibilities described by the classification to which his position was allocated, on a best fit basis, the classification best described the level, scope and diversity of the overall duties and responsibilities of his position.

While you occasionally perform higher level duties, you do not perform ITS/AS6 level duties a majority of the time. One of the arguments you raise is that your position should be allocated ITS/AS6 level because you supervise other ITS5 positions. While it appears that supervision of the experts in your area may exceed the ITS5 classification, allocation decisions are not generally based on supervision alone. Rather, when determining the best fit for a position, consideration is given to the totality of duties and level of responsibilities and the allocation is made to the classification which best encompasses the majority of those duties and responsibilities. The majority of your duties and responsibilities do not fit within the definition and distinguishing characteristics of the ITS/AS6 classification, therefore, allocation to this classification is not appropriate.

The distinguishing characteristics for the ITS5 classification state:

This is the supervisory or expert level. Provides expert consultation and specialized analysis, design, development, acquisition, installation, maintenance, programming, testing, quality assurance, troubleshooting, and/or problem resolution tasks for major organization-wide, high risk/high impact, or mission-critical applications computing and/or telecommunication systems, projects, databases or database management systems; support products, or operational problems.

Performs highly-complex tasks such as conducting capacity planning to determine organization-wide needs and make recommendations; designing complex agency- or institution-wide enterprise systems crossing multiple networks, platforms or telecommunication environments; overseeing the daily operations of large-scale or enterprise systems; identifying and resolving operational problems for major high risk systems with centralized, organization-wide functions; testing multi-dimensional applications, providing quality assurance; developing standards or enhancing existing, high risk and impact, mission critical applications; integrating business solutions, or writing feasibility studies and decision packages for high visibility/impact initiatives.

Provides leadership and expert consultation for large-scale projects or enterprise systems that often integrate new technology and/or carry out organization-wide information technology functions, or impact other institutions or agencies.

Provides project management leadership, technical expertise and demonstrates knowledge of project management practices, principles, and skills.

May supervise information technology specialists or function as a recognized expert who is sought out by others in resolving or assessing controversial or precedent-setting issues.

The ITS5 classification best describes the level, scope and diversity of the majority of your overall duties and responsibilities. You supervise information technology specialists and function as the recognized expert for the Analyst Group within the Project and Planning Office. The ITS5 encompasses supervision of others as well as positions that provide expert consultation.

In addition, you provide leadership for large and small projects, including complex projects, and you function as the lead analyst for internal and external projects. You provide expert consultation and specialized analysis as a member of project teams, including providing leadership in determining project timelines, assigning internal and external resources to tasks, acting as an expert consultant on the requirements to be supported in the systems, and providing guidance regarding the solutions developed for the projects. You also participated in the IS quarterly planning process to identify upcoming resource needs and you were involved in the group that developed, modified, enhanced and reviewed the policies and procedures governing the Requirements Development and Management Process. These activities fall within the distinguishing characteristics of the ITS5 classification.

The majority of your overall duties and level of responsibility and the scope of your assignments are best described by the ITS5 classification. Your position is properly allocated.

Appeal Rights

If this position is covered by a Collective Bargaining Agreement, please refer to the contract to determine whether the parties have appeal rights to the Personnel Resources Board.

If this position is not represented, WAC 357-49-018 provides that either party may appeal the results of the Director's review to the Personnel Resources Board by filing written exceptions to the Director's determination in accordance with Chapter 357-52 WAC. An appeal must be received in writing at the office of the Board within thirty (30) calendar days after service of the Director's determination. The address for the Personnel Resources Board is 2828 Capitol Blvd., P.O. Box 40911, Olympia, Washington, 98504-0911.

If no further action is taken, the Director's determination becomes final.

Sincerely,

Holly Platz, SPHR
Director's Review Investigator

cc: Shelby Krismer Harada, DOL
Lisa Skriletz, DOP